

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:24-cv-10049

DECLARATION OF MARIO LAVANDEIRA IN SUPPORT OF MOTION TO SEAL

I, Mario Armando Lavandeira, Jr., declare:

1. I am the individual subpoenaed in connection with the above-captioned matter.
2. I am not a party to this action.
3. I maintain a personal interest in protecting my private identifying information, including my home address, email, and phone number, from being made publicly available.
4. This request is narrowly tailored to preserve my safety and privacy without obstructing any legitimate interests in this case.
5. Attached as Exhibit A is a copy of my written communication to the legal counsel for Plaintiff requesting a meet and confer regarding the subpoena.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 22, 2025, in Las Vegas, Nevada.

/s/ Mario Lavandeira

Mario Armando Lavandeira, Jr.

aka Perez Hilton